To: McGuigan, David[McGuigan.David@epa.gov]

From: rogers, rick

Sent: Mon 12/21/2015 7:38:56 PM

Subject: FW: NPDES Permit Renewal & Enforcement Washington Aqueduct

#2

<<<<<<<<>>>>>>

Rick Rogers, Associate Director
Office of Drinking Water and Source Water Protection (3WP20)
Water Protection Division
U.S. EPA Region 3
1650 Arch Street
Philadelphia, PA 19103
Tolo: 215 814 5711

Tele: 215.814.5711 Fax: 215.814.3163 rogers.rick@epa.gov

From: Gray, Wendy

Sent: Monday, December 21, 2015 8:22 AM **To:** rogers, rick < rogers.rick@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

They took away the violations showing in months 8 and 12, but still SNC. This is what is showing in the database today.

If you could still talk to Dave that would help. I still have a meeting on the books for Tuesday afternoon, that I'd like to change to Weds with the correct audience if we still need it.

Thanks! Wendy File Edit View Favorites Tools Help

Enforcement and Compliance History Online

You are here Home > Detailed Facility Report

Detailed Facility Report

+ Expand All - Collapse All



US ARMY CORPS OF ENGINEERS DALECARLIA WTP 5900 MACARTHUR BOULEVARD NW, WASHINGTON

FRS ID: 110000500841

EPA Region: 03 Latitude: 38.938

Longitude: -77.113291 Locational Data Source: TRIS

Industry: Utilities Indian Country: N

Enforcement and Compliance Summary &

| Figure 1 | Insp (5 Years) | Date of Last Inspection | Corrent Compliance Status | Cors in NC (at 12) | Ores in Significant Violation | Informal Enforcement Actions (5 years) |
|----------|-------------------|----------------------------|------------------------------|-----------------------|----------------------------------|--|
| CAA | illinis | 460 | ww. | linki | Sink | 766.001 |
| CWA | | 05/13/2015 | Na Volta | 4 | | |
| RCRA | tikas | A 23/2005 | No Violation | • | • | ###################################### |
| SOWA | | | No Violation | | • | |

Related Reports

Q Air Pollutant Report

CWA Pollutant Loading Report

CVVA Effluent Charts.

Regulatory Information

Clean Air Act: No Information

Clean Water Act: Major, Permit Expired (OC0000019)

Resource Conservation and Recovery Act: Active (H) CESQG (DC19 Safe Drinking Water Act: OWNER: Federal government SOURCE: Su Permit Active (DC0000001)



From: rogers, rick

Sent: Monday, December 21, 2015 8:13 AM **To:** Gray, Wendy < Gray. Wendy @epa.gov>

Cc: Wisniewski, Patti-Kay < Wisniewski. Patti-Kay@epa.gov >; Crumlish, Karen < Crumlish. Karen@epa.gov >

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Thanks, Wendy.

From: Gray, Wendy

Sent: Monday, December 21, 2015 7:57 AM **To:** rogers, rick <<u>rogers.rick@epa.gov</u>>

Cc: Wisniewski, Patti-Kay < Wisniewski. Patti-Kay@epa.gov >; Crumlish, Karen < Crumlish. Karen@epa.gov >

Subject: FW: NPDES Permit Renewal & Enforcement Washington Aqueduct

Rick

Here is the latest in the Aqueduct chain of emails...

Thanks Wendy

From: Gray, Wendy

Sent: Friday, December 18, 2015 5:15 PM

To: Seligman, Andrew < Seligman.Andrew@epa.gov >; Ford, Nancy < Ford.Nancy@epa.gov > Cc: Trulear, Brian < Trulear.Brian@epa.gov >; Menen, Christopher < menen.chris@epa.gov >

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Thanks! Shall I expect that ECHO will reflect the changes on Tuesday, which is earlier than their request? (SDWA databases aren't that fast)

If yes, sounds like we might not need a Tuesday meeting. Otherwise, we might need a letter or some correspondence to them explaining what is transpiring.

Have a good weekend!

Wendy Gray, P.E. Environmental Engineer US EPA Region III Drinking Water Branch 1650 Arch Street (3WP21) Philadelphia, PA 19103 Office: (215) 814-5673 Cell: (267) 216-6521

Cell: (267) 216-6521 Fax: (215) 814-2302 Gray.Wendy@EPA.gov From: Seligman, Andrew

Sent: Friday, December 18, 2015 5:03 PM **To:** Gray, Wendy < Gray. Wendy @epa.gov>

Cc: Trulear, Brian < Trulear.Brian@epa.gov>; Menen, Christopher < menen.chris@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

The two items have been resolved. They are no long identified as SNC. Nancy Ford put the changes in today.

Andrew F. Seligman
Environmental Scientist & Enforcement Officer
NDPES Enforcement Branch
1650 Arch Street, 3WP42
Philadelphia, Pennsylvania
19103
(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators" Edward Gibbon, English Historian 1734-1794

"There is no education like adversity" Benjamin Disraeli, British Prime Minister

From: Gray, Wendy

Sent: Friday, December 18, 2015 4:53 PM

To: Seligman, Andrew <Seligman.Andrew@epa.gov>

Cc: Trulear, Brian <Trulear.Brian@epa.gov>; Menen, Christopher <menen.chris@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

As long as someone to explain to me why ECHO shows that they are in significant non-compliance, it can be a permitting meeting.

From: Seligman, Andrew

Sent: Friday, December 18, 2015 4:43 PM **To:** Gray, Wendy < Gray. Wendy @epa.gov>

Cc: Shamet, Stefania < Shamet. Stefania@epa.gov >; Trulear, Brian < Trulear. Brian@epa.gov >; Menen,

Christopher < menen.chris@epa.gov >

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Pass it on to NPDES Permitting. Administrative extension of an existing permit are allowed. As long as WA submitted a permit renewal application, there is no enforcement issue.

Andrew F. Seligman
Environmental Scientist & Enforcement Officer
NDPES Enforcement Branch
1650 Arch Street, 3WP42
Philadelphia, Pennsylvania
19103
(215)814-2097

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"There is no education like adversity" Benjamin Disraeli, British Prime Minister

From: Gray, Wendy

Sent: Friday, December 18, 2015 4:37 PM

To: Seligman, Andrew < Seligman. Andrew@epa.gov >

Cc: Shamet, Stefania < Shamet. Stefania@epa.gov >; Trulear, Brian < Trulear. Brian@epa.gov >; Menen,

Christopher < menen.chris@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Well, it looks to me like it is both... but I'm from SDWA

-Permit renewal being a permit issue, and

-Permit enforcement of the permitted/authorized discharges requested by WA and approved by EPA Region 3 under the "bypass" clause of the NPDES Permit #0000019.

From: Seligman, Andrew

Sent: Friday, December 18, 2015 4:34 PM
To: Gray, Wendy < Gray. Wendy @epa.gov>

Cc: Shamet, Stefania <Shamet.Stefania@epa.gov>; Trulear, Brian <Trulear.Brian@epa.gov>; Menen,

Christopher < menen.chris@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Permit Renewal is a Permit Issue.

Andrew F. Seligman
Environmental Scientist & Enforcement Officer
NDPES Enforcement Branch
1650 Arch Street, 3WP42
Philadelphia, Pennsylvania
19103

(215)814-2097

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"There is no education like adversity"
Benjamin Disraeli, British Prime Minister

From: Gray, Wendy

Sent: Friday, December 18, 2015 4:32 PM

To: Seligman, Andrew < Seligman. Andrew@epa.gov >

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

Andrew,

Thanks for pointing that out. Based on the information provided, does this seem to you like it is primarily an NPDES enforcement or permitting issue? Or really do we have a chicken and egg situation.

I really didn't know who to reach to and went to permitting first, but would be glad to change the intent to enforcement if that is the primary focus.

Thanks!

Wendy Gray, P.E. Environmental Engineer US EPA Region III Drinking Water Branch 1650 Arch Street (3WP21) Philadelphia, PA 19103 Office: (215) 814-5673

Cell: (267) 216-6521 Fax: (215) 814-2302 Gray.Wendy@EPA.gov

From: Seligman, Andrew

Sent: Friday, December 18, 2015 4:19 PM

To: Gray, Wendy < Gray. Wendy@epa.gov >; Trulear, Brian < Trulear. Brian@epa.gov >

Cc: Bendik, Kaitlyn < bendik.kaitlyn@epa.gov >; Ottinger, Elizabeth < Ottinger.Elizabeth@epa.gov >; Menen, Christopher < menen.chris@epa.gov >; Moncavage, Carissa < Moncavage.Carissa@epa.gov >;

Shamet, Stefania < Shamet. Stefania@epa.gov>

Subject: RE: NPDES Permit Renewal & Enforcement Washington Aqueduct

You will need to include Stef Shamet in this discussion.

We need to be careful here as we need to avoid any possibility or appearance of commingling.

Stef--Please advise if I should not go to this meeting.

Andrew F. Seligman
Environmental Scientist & Enforcement Officer
NDPES Enforcement Branch
1650 Arch Street, 3WP42
Philadelphia, Pennsylvania
19103
(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators" Edward Gibbon, English Historian 1734-1794

"There is no education like adversity"
Benjamin Disraeli, British Prime Minister

-----Original Appointment-----

From: Gray, Wendy

Sent: Friday, December 18, 2015 4:01 PM

To: Trulear, Brian

Cc: Bendik, Kaitlyn; Ottinger, Elizabeth; Seligman, Andrew; Menen, Christopher; Moncavage, Carissa

Subject: NPDES Permit Renewal & Enforcement Washington Aqueduct

When: Tuesday, December 22, 2015 3:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Conf Room TBD

See below request from Washington Aqueduct regarding NPDES enforcement and related permit status.

Wendy,

After Mary Letzkus retired, our NPDES renewal application has been dormant. That renewal application was timely and asked for a couple of minor adjustments. We have not pushed from our end on reissuing the permit because the de facto administrative extension of the permit that was expiring meets our needs.

So, I don't know to whom the reissuance has been assigned.

Tom Jacobus

Washington Aqueduct

From: Gray, Wendy

Sent: Thursday, December 17, 2015 6:04 PM

To: Trulear, Brian

Cc: Bendik, Kaitlyn; Wisniewski, Patti-Kay; rogers, rick

Subject: Fwd: ECHO Noncompliance

Brian.

I'm not sure if your office is best to address this or whether enforcement is. This is a request by the Washington Aqueduct drinking water system.

Wendy Gray, P.E. Environmental Engineer US EPA Region III Drinking Water Branch 1650 Arch Street (3WP21) Philadelphia, PA 19103 Office: (215) 814-5673

Cell: (267) 216-6521 Fax: (215) 814-2302 Gray.Wendy@EPA.gov

Begin forwarded message:

From: "Choudhary, Shabir A WAD" < Shabir.A.Choudhary@usace.army.mil >

Date: December 17, 2015 at 11:49:40 AM EST **To:** "Gray, Wendy" < Gray. Wendy@epa.gov>

Cc: "Jacobus, Thomas P WAD" < Thomas.P.Jacobus@usace.army.mil, "Cole, Nathan H WAD" < Nathan.H.Cole@usace.army.mil, "Tesema, Mel M WAD"

< Mel.M.Tesema@usace.army.mil >, "Bratton, Richard E MAJ WAD" < Richard.E.Bratton@usace.army.mil >, "Taylor, Reginald E WAD"

< Reginald.E. Taylor@usace.army.mil >

Subject: ECHO Noncompliance

Hi Wendy:

Happy Holidays! Hope that you are enjoying the holiday season and in good spirit.

I tried to call you but could not get in touch with you. Washington Aqueduct (WA) needs your immediate assistance with respect to compliance status in the Enforcement and Compliance History Online (ECHO).

This database is showing noncompliance for WA for FY 2014 and FY 2015 and this is related to permitted/authorized discharges requested by WA and approved by EPA Region 3 under the "bypass" clause of the NPDES Permit #0000019.

WA is requesting correction so that this error in the of this database be corrected and noncompliance be removed. We became aware of this issue when we were gathering needed information to for the Environmental Awards with the Army. To be eligible for this award, the organization should not have significant noncompliance.

When the ECHO database was searched, it reported two noncompliance during the FY 2014 and FY 2015 (see 2 attachments). For this period, all of the discharges from WA have always been in compliance with the conditions stipulated by EPA Region 3 in approval of "bypass" requests.

Our eligibility is determined by what's reported in the EPA's Enforcement and Compliance History Online (ECHO). The specific eligibility criteria is below:

"Compliance History. Each installation in the U.S. or its territories shall submit the latest available Detailed Facility Report from the ECHO database (https://www.echo.epa.gov). Installations with High Priority Violations (HPV) or Significant Non-Compliance (SNC) during the 2014-2015 achievement period will be ineligible to compete in any category of the SecArmy and SecDef Environmental Awards, unless the installation can prove (with supporting documentation) that its inclusion in the ECHO report is erroneous. Prior to submitting nomination packages to OACSIM, ACOMs/Agencies shall screen nominees against the ECHO report, as well as their own internal reporting on environmental violations, at each of the installations nominated."

Therefore, WA is requesting EPA Region 3 a formal letter stating that "Washington Aqueduct does not have High Priority Violations (HPV) or Significant Non-Compliance (SNC) during the 2014-2015 period so that we can proceed with our request for Environmental Awards with the Army.

Your immediate help is requested in this regard as the deadline for this submission is 12/27/2015.

Thanking you in anticipation.

Regards,

Shabir A. Choudhary, P.E. Section Chief Washington Aqueduct Phone:202-764-2771 Office and 202-345-2734 Cell

<< Message: Fwd: ECHO Noncompliance >>